

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HEALTH INSURANCE PLAN OF NEW
YORK, et al.,

Plaintiff,

v.

AVENTIS PHARMACEUTICALS, INC.,

Defendant.

Civil Action No. 07-cv-6785 (HB)

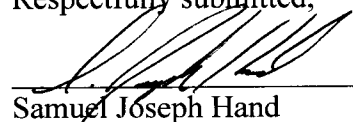
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U.S. DISTRICT COURT
2007 DEC 19 PM 4:38
S.D. OF N.Y.

NOTICE OF MOTION FOR PRO HAC VICE ADMISSION

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Samuel Joseph Hand and the exhibits annexed thereto, Defendant Aventis Pharmaceuticals, Inc. will move this Court before the Honorable Harold Baer, United States District Judge, Southern District of New York, for an Order, in the form annexed hereto, granting the *pro hac vice* admission of Geoffrey S. Irwin to act as counsel for Aventis Pharmaceuticals in this matter pursuant to Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York. Mr. Irwin is an associate at Jones Day and resident in the Washington D.C. office of the firm, located at 51 Louisiana Avenue, NW, Washington D.C. 20001 (202)-879-3939.

Dated: December 19, 2007

Respectfully submitted,



Samuel Joseph Hand
JONES DAY
222 East 41st Street
New York, New York 10017-6702
Tel: 212-326-3939
Fax: 212-755-7306

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SC#
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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HEALTH INSURANCE PLAN OF NEW YORK, et al.,)	
)	
Plaintiff,)	Civil Action No. 07-cv-6785 (HB)
)	
v.)	
)	
AVENTIS PHARMACEUTICALS, INC.,)	
)	
Defendant.)	

DECLARATION OF SAMUEL JOSEPH HAND IN SUPPORT OF MOTION FOR *PRO HAC VICE* ADMISSION OF GEOFFREY S. IRWIN

Samuel Joseph Hand, pursuant to the provisions of 28 U.S.C. § 1746, states and declares as follows:

1. I am an associate at Jones Day, counsel for Defendant in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's application for an order granting Geoffrey S. Irwin *pro hac vice* admission to this Court to participate in the above-captioned action, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in April 2005. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this court.

3. Geoffrey S. Irwin is an associate at Jones Day and resident in the Washington D.C. office of the firm. He is of high moral character. He was admitted to practice before the courts of Illinois on November 11, 1996 and is currently in good standing. An original letter from the

Attorney Registration and Disciplinary Commission of the Supreme Court of Illinois, dated December 12, 2007, is annexed hereto as Exhibit A. He was admitted to practice before the District of Columbia Court of Appeals on January 10, 2000 and is currently a member in good standing. A Certificate of Good Standing issued by the District of Columbia Court of Appeals, dated December 7, 2007, is annexed hereto as Exhibit A.

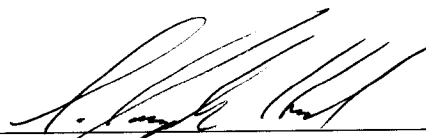
4. Pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I request that Geoffrey S. Irwin be permitted to appear *pro hac vice* for all purposes in connection with the above-captioned action.

7. Annexed hereto as Exhibit B is a proposed order granting this motion.

8. I declare under penalty of perjury that the foregoing is true and correct.

WHEREFORE, it is respectfully requested that this Court grant Geoffrey S. Irwin *pro hac vice* admission to the bar of this Court for all purposes in connection with this case.

Dated: New York, New York
December 19, 2007



Samuel Joseph Hand (SH-9275)



ATTORNEY REGISTRATION AND DISCIPLINARY COMMISSION
of the
SUPREME COURT OF ILLINOIS

One Prudential Plaza
130 East Randolph Drive, Suite 1500
Chicago, IL 60601-6219
(312) 565-2600 (800) 826-8625
Fax (312) 565-2320

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(217) 522-6838 (800) 252-8048
Fax (217) 522-2417

Geoffrey S. Irwin
Jones Day
51 Louisiana Avenue, NW
Washington, DC 20001

Chicago
Wednesday, December 12, 2007

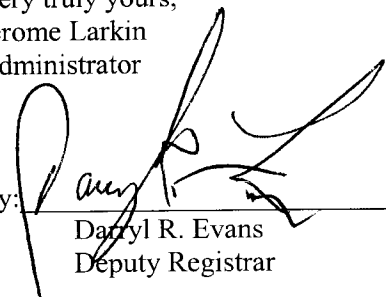
Re: Geoffrey Smith Irwin
Attorney No. 6237356

To Whom It May Concern:

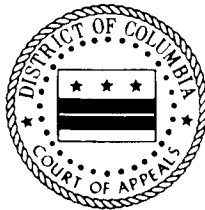
We have received a request for written verification of the status of Geoffrey Smith Irwin for use by officials responsible for the review of the attorney's application for admission to the bar of another jurisdiction, or for a judicial position or for government employment. We have also received a Waiver and Authorization signed by the attorney. Pursuant to Commission policy, the following information is provided.

The records of the Clerk of the Supreme Court of Illinois and of this office reflect that Geoffrey Smith Irwin was admitted to practice law in Illinois on 11/7/1996; is currently registered with this Commission and in good standing as an Illinois attorney; has never been disciplined or the subject of a disciplinary proceeding in this state; and is not the subject of any pending disciplinary investigations.

Very truly yours,
Jerome Larkin
Administrator

By: 
Darryl R. Evans
Deputy Registrar

DRE



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

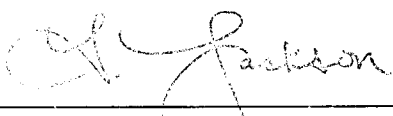
GEOFFREY S. IRWIN

was on the 10TH day of JANUARY, 2000

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on December 7, 2007.

GARLAND PINKSTON, JR., CLERK

By: 
Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HEALTH INSURANCE PLAN OF NEW
YORK, et al.,

Plaintiff,

V.

AVENTIS PHARMACEUTICALS, INC.,

Defendant.

Civil Action No. 07-cv-6785 (HB)

ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Defendant Aventis Pharmaceuticals, Inc. dated December 19, 2007, for an Order pursuant to Rule 1.3(c) of the Rules of the United States District Courts for the Southern and Eastern Districts of New York granting *pro hac vice* admission to Geoffrey S. Irwin in connection with the above-captioned action, and upon consideration of the motion and declaration in support thereof, it is

ORDERED that Geoffrey S. Irwin is granted *pro hac vice* admission to the bar of this Court for the purpose of participating in this action.

Dated: New York, New York
, 2007

Honorable Harold Baer
United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Motion for Pro Hac Vice

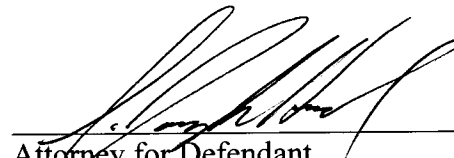
Admission was delivered by placing the same in first class mail on this 19th day of December,

2007 to:

Thomas M. Sobol
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Attorney for Defendant
Aventis Pharmaceuticals, Inc.